

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Tonawanda Coke Corporation - Removal Polrep  
Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region II

**Subject:** POLREP #5  
Tonawanda Coke Corporation  
0201601  
Tonawanda, NY

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**From:** Dwayne Harrington, OSC

**Date:** 10/20/2018

**Reporting Period:**

1. Introduction

1.1 Background

<b>Site Number:</b>	A28U	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Emergency
<b>Response Lead:</b>	STATE	<b>Incident Category:</b>	
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	10/13/2018	<b>Start Date:</b>	10/13/2018
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	NYD088413877	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	Yes
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

1 Incident Category

1.1 Emergency Response

1.1.2 Site Description

Tonawanda Coke Corporation is an industrial coke plant; approximately 160 acres in an industrial area. The facility has been in operation for approximately 100 years. The 30 currently operating coke ovens have been in use since early 1960.

1.1.2.1 Location

The facility is located at 3875 River Rd, Tonawanda, Erie County, New York. The area is an industrial area adjacent to the Niagara River. The nearest residence is located approximately 0.25 miles away.

1.1.2.2 Description of Threat

There is an immediate threat of release of hazardous substances during the flaring off of coke oven gases. A full removal site evaluation will be conducted and addressed following facility shutdown.

### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA and NYSDEC personnel are currently on site during coke oven process shutdown. EPA is conducting air monitoring and sampling in support of NYSDEC's oversight of shutdown activities to assess public impact in the event of a release.

EPA continues the inspection of the facility, accompanied by TCC and contractors, to identify all areas of concern and determine facility operations that will need to be conducted by TCC after shutdown.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.2 Response Actions to Date

EPA and NYSDEC personnel are currently on site during coke oven process shutdown and flaring of the flammable gases in the spherical gas tank. EPA is conducting air monitoring and sampling in support of NYSDEC's oversight of shutdown activities to assess public impact in the event of a release. The coke battery purge was completed October 16, 2018.

The flaring of the gas sphere continues and is expected to be completed tomorrow. Air surveillance will continue for a 24-hour cycle after the flaring is complete. After that, the plan is to shut down the monitoring network until such time as we start intrusive activities onsite.

The facility is currently purging the sphere with the third and final truck of nitrogen gas, after which the sphere will be considered to have been emptied. To date, minimal flaring has been observed at the East Flare, which indicates that there is very little oven gas remaining in the sphere. The flaring operations are currently anticipated to be completed this evening.

TCC personnel are currently providing 24-hour security.

On October 17, 2018, the consent to access form was signed by TCC.

All six air surveillance stations are fully operational and are located:

TCP 01 - Tonawanda Coke Plant Guardhouse – On the Southwest corner of the Plant

TCP 02 - River Road Volunteer Fire Stations – South of plant, adjoining a small residential area. Located in the side yard next to the fire station

TCP 03 - Sheridan Fire District – behind the firehouse secured to the fencing surrounding their emergency generator

TCP 04 – DEC Grand Island Boulevard Station – NE of Plant. Semi-permanent trailer established by DEC for their historic benzene monitoring (no live transmittal of data) and sampling program (once every 6 days)

TCP 05 – DEC Brookside Terrace Station - NE of Plant in a residential neighborhood. Semi-permanent trailer established by DEC for their historic benzene monitoring (no live transmittal of data) and sampling program (once every 6 days)

TCP 06 - William Kaagebein Elementary School – NW of plant, in a residential neighborhood. Station is placed in the courtyard of the school at the request of the Superintendent to ensure the security of the equipment.

To date, no exceedances above background have been observed in the six area air monitoring stations or in any of the Summa confirmatory laboratory samples.

October 20, 2018:

Coke oven gas sphere purging and flaring operations were completed in the morning of October 20, 2018. The sphere is empty and will be left open to atmosphere.

EPA will continue area air sampling through Sunday, October 21, 2018. No exceedances above background have been observed in the six air monitoring stations or in any of the confirmatory laboratory samples.

#### 2.1.3 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

TCC filed for bankruptcy on October 16, 2018. ORC continues to represent EPA's interest with TCC attorneys.

#### 2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

EPA air surveillance will continue throughout oven gas sphere flaring operations.

EPA is preparing to assume responsibility for all utilities to maintain power to the facility, site security, and plant process and storm water treatment prior to discharge to two permitted outfalls (one to Publicly Owned Treatment Works (POTW) and one to Niagara River). Additional activities will be added as the

removal assessment progresses. The facility is still undergoing the shutdown process following the announcement of bankruptcy. Personnel continue removing personal belongings from their lockers and vendors are removing equipment.

#### 2.2.1.1 Planned Response Activities

#### 2.2.1.2 Next Steps

Following shutdown and purging of the coke process, EPA will assess the potential public and environmental threats posed by the site.

#### 2.2.2 Issues

TCC will not inform EPA how long they will remain on site to assist with transition.

### 2.3 Logistics Section

No information available at this time.

### 2.4 Finance Section

#### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$150,000.00	\$0.00	\$150,000.00	100.00%
Intramural Costs				
Total Site Costs	\$150,000.00	\$0.00	\$150,000.00	100.00%

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

### 2.5 Other Command Staff

No information available at this time.

## 3. Participating Entities

### 3.2 Cooperating Agencies

EPA is coordinating with NYSDEC and the Town of Tonawanda Water Resources Department during facility shutdown.

## 4. Personnel On Site

Two OSCs, one DECA member, one ERT member, 1 ERRS member and two ERT-SERAS staff are on site.

## 5. Definition of Terms

No information available at this time.

## 6. Additional sources of information

### 6.1 Internet location of additional information/report

## 7. Situational Reference Materials

No information available at this time.